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April 12, 2023

By ECF

Hon. P. Kevin Castel
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Miller et al. v. City of New York et al.*, 21 Civ. 2616 (PKC)

Dear Judge Castel:

Together with Alexander Reinert, this firm represents the Plaintiffs in this putative class action. The next conference in this case is scheduled for tomorrow, April 13, 2023.

We are pleased to report that the parties have reached agreement on a global settlement. We write jointly with defense counsel to make two requests.

First, the current deadline for moving for conditional approval of the settlement is this coming Monday, April 17, 2023. Given that final negotiations took longer than expected, we would greatly appreciate it if the Court would extend that deadline for two days until Wednesday, April 19, 2023.

Second, the parties respectfully request that the conference scheduled for tomorrow be rescheduled to a date to be determined after the motion for conditional approval is submitted next week, should the Court determine at that time that a conference is necessary.

We appreciate the Court's attention to these two requests.

Respectfully submitted,



John R. Cuti